

To
Clerk's Office
United States District Court
Northern District Of California
280 South 1st Street
San Jose, CA -95113

Date: 06/18/2008

FILED

JUN 20 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Subject: Reply from Wipro Ltd, regarding Case Number **C08 01600 PVT**

Dear Sir,

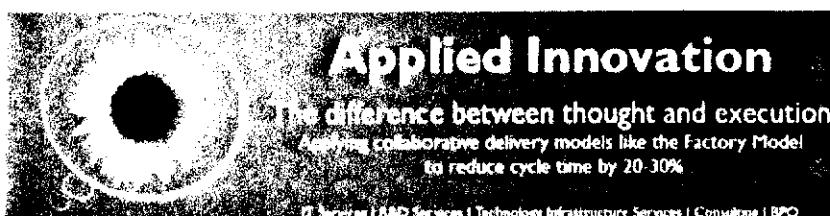
CLERK

Attached is the reply I have received from Wipro Ltd., mentioned as Wipro Technologies Inc., in my complaint and summons sent to them. I took legal name of the company from their website and i sent the complaints and summons to their office in CA even though incident happened in CA and MA. I kept this name of Wipro Technologies Inc., after going through their web site <http://www.wipro.com> that Wipro Technologies Inc., is the consulting arm of the company and I am attaching the printouts from their website showing the proof of this name Wipro Technologies Inc., but if company says that legal name is Wipro Ltd., i can modify this name into my original complaint. Wipro Ltd. (Wipro Technologies Inc. mentioned in the complaint) was involved in a project with J P Morgan Chase at their Lowell, MA (U.S.A) office (With their onsite Project manager Mahesh Kolari) during my employment there from April 2006 to August 2006. I am also sending a copy of the same to the address of their lawyer (Gregory C. Cheng) mentioned is their reply attached with this letter. After getting an approval from the court and from Wipro Ltd., I will change name in my complaint from Wipro Technologies Inc., to Wipro Ltd.

Please feel free to give me a call if any other information is required.

Thanks & Regards

AR
Anoop Rajkumar
73 Park Drive, Apt # 16
Boston, MA 02215
Tel: 650-331-7324



Applied Innovation

At Wipro we have fine-tuned the science of creating innovation through a blend of practicality, design, and our solutions for end customers. Applied to business, it is a process to release newer ideas and newer ways of doing things into all parts of the organization, and improve business outcomes often without major disruptive change. At a 360-degree business approach, it covers people, delivery business, and technology functions, that help Wipro to work collaboratively with clients to create value, speed to market and new business opportunities. Wipro is ranked as the 11th largest IT services company in the world, 4th largest information technology solutions and a global delivery network with 140+ delivery centers and 110+ offices, such as MMTC, Wipro Health Solutions, Wipro Retail Solutions, and Wipro Manufacturing.

Infuse Innovation

- 1. **Planning the Future Art of Global Collaboration**
- 2. **Reducing The Friction Of New Ideas At The Middle Stage**
- 3. **The 3 Challenges of The Middle-Phase Organization**
- 4. **Learn of What's In The Ages - A Standard Business Culture, Is It Truly Sustainable?**
- 5. **Empirical Assessment Model for Cultural Differences: A New Research Project**
- 6. **New Insights for Discourse (ES)**

You know these chapters are works in progress, so don't expect to find the final, polished results. Instead, download Appendix 1 from www.wiley.com/go/white.

ANALYSTS' REPORTS

Wipro is a Leader in SAP implementation Services. For more information, visit www.wipro.com.

Forrester positions Wipro as a Strong Performer in the "The Forrester Wave™ - Security Consulting Q3 2007".

Wipro has the potential to become a market leader for NGOSS. Forrester also complements Appirio's effort in building a more strategic consulting

卷之三

AWARDS

- **Project Award** from National Institute for Software Testing for Software Testing Best Practice Award
- **Project Testing Award** Microsoft Award 2007
- **Micro and Network Quality Assurance Excellence Award**
- **Microsoft PIAF 9 Pinnacle Award for Software Solution Leadership**
- **Project QI Sweepstakes 2002 & 2003 Special Excellence Awards**

• EPIPHENOMENAL

Since 1985, GEI has provided the software, hardware and consulting for more than 1000 installations worldwide. GEI's unique experience in the design and implementation of the System 9000 and GEOPAK systems, and its extensive experience in the design and implementation of the Engineering and Material Model, which governs and guides the design evolution of the partnership we have developed. We are happy to work with a native partner like GEPI, they understand our business needs and help us do well. GEI is a valuable resource to our customers.

Lack of operational efficiency is the biggest bottleneck for Wealth Managers
A Wipro research study reveals

www.ijerph.com

Knowledge base

Innovation Sourcing: All Roads Lead to Collaborative Partnerships Networks. A

Study conducted jointly by Wharton Technologies and Knowledge@Wharton

Aftermap | Previous Page | Next Page | Home



WIPRO TECHNOLOGIES

Wipro.com



About Wipro

IT SERVICES

PRODUCT ENGINEERING SOLUTIONS

TECHNOLOGY INFRASTRUCTURE SERVICES

BUSINESS PROCESS OUTSOURCING

CONSULTING SERVICES

Home > About Wipro

Wipro Technologies is the No.1 provider of integrated business, technology and process solutions on a global delivery platform.

Wipro Technologies is a global services provider delivering technology-driven business solutions that meet the strategic objectives of our clients. Wipro has 40+ 'Centers of Excellence' that create solutions around specific needs of industries. Wipro delivers unmatched business value to customers through a combination of process excellence, quality frameworks and service delivery innovation. Wipro is the World's first CMMI Level 5 certified software services company and the first outside USA to receive the IEEE Software Process Award.

Fast Facts

- The largest independent R&D Services provider in the world
- Over half billion revenue from R&D
- Among the top 3 offshore BPO services provider in the world
- A strategic partner to five of the top ten most innovative companies in the world
- Only Indian company to be ranked among the top 10 global outsourcing providers in IAOP's 2006 Global Outsourcing 100 listing

WIPRO FACT FILE

Wipro is the world's largest independent R&D Services Provider. Learn other facts that place Wipro among industry leaders.

more >

MANAGEMENT TEAM

This is the team that defines Wipro's journey with vision and integrity.

more >

FINANCIALS

Financial analysis, statements, annual reports - track Wipro's strong growth and performance.

more >

INFRASTRUCTURE

Wipro's secure, robust, and agile infrastructure has been rated best-in-class during client audits.

more >

CORPORATE GOVERNANCE

Wipro's corporate governance charter, committees and Board of Directors.

more >

PEOPLE

The team that keeps Wipro on the cutting edge of innovation values.

more >

VALUES

Spirit of Wipro: Intensity to Win, Act with Sensitivity and Unyielding Integrity.

more >

QUALITY

Wipro is the world's first SEI-CMM Level 5 IT Services company. Customers have benefited from Wipro's quality process maturity.

more >

LOCATIONS

Wipro's global network of development centers and sales offices.

more >

ALLIANCES

Best-in-class alliances to deliver best of breed solutions to our clients.

more >

RECOGNITION

Wipro's roll of honour.

more >

INNOVATION

The Wipro way of innovation is really about a deliberate, sustained commitment to innovation. "Innovation is Wipro - Wipro is Innovation".

more >

Wipro.com
About Wipro
Contact Us
Search wipro.com

- Analyst Reports
- Case Studies
- White Papers

Subscribe to 'Peer Ping' our monthly newsletter

Request for Information

Related Links

- The People and the Power
- The Wipro Management Team
- Awards and Recognition
- Our Communities



WIPRO TECHNOLOGIES



IT SERVICES

PRODUCT ENGINEERING SOLUTIONS

TECHNOLOGY INFRASTRUCTURE SERVICES

BUSINESS PROCESS OUTSOURCING

CONSULTING SERVICES

Home About Wipro Locations

Canada & USA

USA - Western Region

Wipro Technologies

• About Us
• Locations
• News & Events
• Press Releases
• Contact Us

North America

USA - Western Region

USA - Midwest Region

USA - Northeast

USA - Southwest Region

USA - Southeast Region

Canada

Mexico

Wipro Technologies - Seattle

• About Us
• Locations
• News & Events
• Press Releases
• Contact Us

Click here for more details

Wipro Fact File

Management Team

Financials

Corporate Governance

People

Values

Customers

Alliances

Recognition

Group Companies

Infrastructure

Quality

Innovation

View PDF
View PPT

Analyst Reports

Case Studies

White Papers

Subscribe to 'Peer Ping' our monthly newsletter

Request for Information

"Wipro is not only investing in their infrastructure in terms of buildings, technology and quality management systems but also in terms of the recruitment of high caliber graduates, education and promotion opportunities."

Karen Forre
Head of IT,
Allianz Ireland

View All Testimonials >>

1 THOMAS M. MCINERNEY, State Bar No. 162055
2 tmm@ogletreedeakins.com
3 GREGORY C. CHENG, State Bar No. 226865
4 gregory.cheng@ogletreedeakins.com
5 PATRICIA SALAZAR, State Bar No. 249935
6 patricia.salazar@ogletreedeakins.com
7 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
8 Steuart Tower, Suite 1300
One Market Plaza
San Francisco, California 94105
Telephone: (415) 442-4810
Facsimile: (213) 442-4870

7
8 Attorneys for Defendant
WIPRO LTD.

9
10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13
14 ANOOP RAJKUMAR,

15 Plaintiff,

16 v.
17

18 CISCO SYSTEMS, INC., WIPRO
19 TECHNOLOGIES, INC., DELOITTE
20 CONSULTING LLC, NAVAL MOHTA,
21 VENU DHARMAPURI, KEENY PAUL and
22 VARIOUS JOHN DOES,

23 Defendants.
24

25 Case No. C08 01600 PVT
26

27 DEFENDANT WIPRO LTD.'S
28 DISCLOSURE STATEMENT PURSUANT
TO FEDERAL RULE OF CIVIL
PROCEDURE 7.1

29 ///

30 ///

31 ///

32 ///

33 ///

34 ///

35 ///

36 ///

37 ///

38 ///

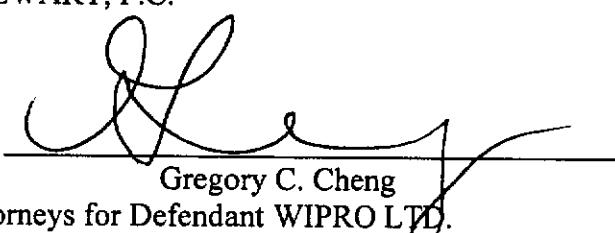
39 CASE NO. C08 01600 PVT

1 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE NORTHERN**
2 **DISTRICT OF CALIFORNIA:**

3 The undersigned counsel of record for Defendant Wipro Ltd. (erroneously sued as "Wipro
4 Technologies, Inc.") ("Defendant"), certifies that it has no parent corporation, and that there is no
5 publicly held corporation that owns ten percent or more of Defendant's stock.

6
7 DATED: June 13, 2008

OGLETREE, DEAKINS, NASH, SMOAK &
8 STEWART, P.C.

9
10 By: 

11 Gregory C. Cheng
12 Attorneys for Defendant WIPRO LTD.

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE BY UNITED STATES MAIL.

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California; I am over the age of 18 years and not a party to this action. My business address is Steuart Tower, Suite 1300, One Market Plaza, San Francisco, California 94105.

On June 13, 2008, I served the following document(s) described as: **DEFENDANT WIPRO LTD.'S DISCLOSURE STATEMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 7.1**, on the persons below as follows:

Anoop Rajkumar, Pro-Se
73 Park Drive, Apt. #16
Boston, MA 02215

I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses as indicated above and:

deposited the sealed envelope or package with the United States Postal Service, with the postage fully prepaid.*

placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United State Postal Service, in a sealed envelope or package with postage fully prepaid.

I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Francisco, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on June 13, 2008, at San Francisco, California.

Jovania Faamaligi

Type Name

Signature

* (SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG)

1 THOMAS M. MCINERNEY, State Bar No. 162055
 2 tmm@ogletreedeakins.com
 3 GREGORY C. CHENG, State Bar No. 226865
gregory.cheng@ogletreedeakins.com
 4 PATRICIA SALAZAR, State Bar No. 249935
patricia.salazar@ogletreedeakins.com
 5 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
 Steuart Tower, Suite 1300
 One Market Plaza
 San Francisco, California 94105
 Telephone: (415) 442-4810
 Facsimile: (213) 442-4870

7 Attorneys for Defendant
 8 WIPRO LTD.

9
 10 **UNITED STATES DISTRICT COURT**
 11 **NORTHERN DISTRICT OF CALIFORNIA**

12 ANOOP RAJKUMAR,

13 Plaintiff,

Case No. C08 01600 PVT

14 v.
DEFENDANT WIPRO LTD.'S NOTICE
 15 **OF RELATED CASES PURSUANT TO**
 16 **LOCAL RULE 3-12**

17 CISCO SYSTEMS, INC., WIPRO
 18 TECHNOLOGIES, INC., DELOITTE
 CONSULTING LLC, NAVAL MOHTA,
 VENU DHARMAPURI, KEENY PAUL and
 VARIOUS JOHN DOES,

Defendants.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

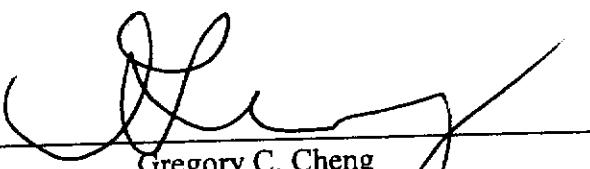
CASE NO. C08 01600 PVT

1 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE NORTHERN**
2 **DISTRICT OF CALIFORNIA:**

3 Pursuant to Local Rule 3-12 of this Court, the undersigned, counsel of record for Defendant
4 Wipro Ltd. (erroneously sued as "Wipro Technologies, Inc.") ("Defendant"), certifies that
5 Defendant is aware of no cases that arise from the same events as the instant action, involve the
6 same issues of fact and law, or are likely to require substantial duplication of labor if heard by
7 different judges.

8 DATED: June 13, 2008

9 OGLETREE, DEAKINS, NASH, SMOAK &
10 STEWART, P.C.

11 By: 

12 Gregory C. Cheng
13 Attorneys for Defendant WIPRO LTD.

CERTIFICATE OF SERVICE BY UNITED STATES MAIL

STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO

I am employed in the County of San Francisco, State of California; I am over the age of 18 years and not a party to this action. My business address is Steuart Tower, Suite 1300, One Market Plaza, San Francisco, California 94105.

On June 13, 2008, I served the following document(s) described as: **DEFENDANT WIPRO LTD.'S NOTICE OF RELATED CASES PURSUANT TO LOCAL RULE 3-12**, on the persons below as follows:

Anoop Rajkumar, Pro-Se
73 Park Drive, Apt. #16
Boston, MA 02215

I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses as indicated above and:

deposited the sealed envelope or package with the United States Postal Service, with the postage fully prepaid.*

placed the envelope or package for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United State Postal Service, in a sealed envelope or package with postage fully prepaid.

I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at San Francisco, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the above is true and correct.

Executed on June 13, 2008, at San Francisco, California.

Jovania Faamaligi

Type Name

Signature

* (SIGNATURE MUST BE OF PERSON DEPOSITING ENVELOPE IN MAIL SLOT, BOX OR BAG)